

THE LAW OFFICES OF RUSSELL E. ADLER PLLC
LABOR AND EMPLOYMENT LAW ADVOCACY, ADVICE & COUNSEL
WWW.RADLERLAWPLLCCOM

370 LEXINGTON AVENUE, SUITE 1012
NEW YORK, NEW YORK 10017

212.867.9711
RUSS@RADLERLAWPLLCCOM

September 22, 2016

Via ECF

Hon. Valerie E. Caproni, U.S.D.J.
Thurgood Marshall United States Courthouse
40 Foley Square, Room 443
New York, New York 10007

Re: MDB LLC d/b/a GreenPearl Events v. Hussain
14-CV-9281 (VEC)

Dear Judge Caproni:

I am writing in response to this morning's letter motion from Mr. Parness, counsel for Held & Hines in the matter *Held & Hines LLP v. Hussain*, 16-CV-5273 (JSR)(SN).

Yesterday I submitted the parties' fully-executed Stipulation of Dismissal with the request that Your Honor So-Order the Stipulation with respect to the parties' request that Your Honor retain jurisdiction as to the settlement agreement. The settlement agreement, as is common in resolved actions, was designated as confidential by the parties. Your Honor has repeatedly urged the parties to resolve this action and I am pleased to report we have done so.

First, to the extent any relief is warranted, I respectfully submit that the issue should be presented to Judge Rakoff who presides over the dispute between Held Hines and Ms. Hussain. Second, to the extent the Held & Hines firm has any liens, such liens concern Ms. Hussain's settlement proceeds, and do not operate to prevent or interfere with the parties' ability to resolve this action. Third, the settlement consideration was transferred prior to receipt of Mr. Parness' letter last evening (and even if that was not the case, the lien would not prevent GreenPearl and Slack from transmitting any consideration). Finally, I note that Mr. Parness' communication referenced in his letter was last evening at 6:42 pm and he filed his letter via ECF at 9:00 am. This is hardly a good faith effort to address this issue.

In sum, I respectfully request that Your Honor deny the requested relief, direct the parties to address their dispute with Judge Rakoff, and that the Court So-Order the Stipulation allowing Ms. Hussain, GreenPearl and Mr. Slack to put this matter behind them.

Respectfully submitted,



Russell E. Adler

cc: All counsel of record via ECF